

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

DOCKET NO. 4:19-cv-11093-TSH

PAUL JONES,

Plaintiff

v.

MONTACHUSETT REGIONAL TRANSIT  
AUTHORITY, Et Al.,

Defendants

DEFENDANT'S OPPOSITION  
TO PLAINTIFF MOTION TO  
REQUEST A PRIVILEGE LOG  
FROM DFEENDANTS IF  
DISCOVERY IS GRANTED

Defendant Montachusett Regional Transit Authority, ("MART") hereby opposes Plaintiff, Paul Jones' ("Plaintiff") Motion to Request a Privilege Log from Defendants If Discovery is Granted.

Plaintiff filed a Motion and Memorandum of Law in Support of Its Motion to Request a Privilege Log From Defendants If Discovery Is Granted ("Motion") prior to the initiation of discovery and prior to MART asserting the attorney client privilege when withholding documents. Plaintiff's Motion is premature. If and when MART asserts the attorney client privilege as a reason for withholding documents, MART will prepare a privilege log in accordance with the Federal Rules of Civil Procedure. Plaintiff's request for a privilege log at this time should be denied.

WHEREFORE, Defendant respectfully requests that this honorable Court deny Plaintiff's Motion to Request a Privilege Log From Defendants.

DEFENDANTS  
MONTACHUSETT REGIONAL TRANSIT  
AUTHORITY et al,

By their attorneys,

/s/ Deborah I. Ecker

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Dated: April 30, 2021

761533/MART/0006

**CERTIFICATE OF SERVICE**

I, Deborah I. Ecker certify that the above document will be served by first-class mail upon any party or counsel of record who is not a registered participant of the Court's ECF system, upon notification by the Court of those individuals who will not be served electronically.

Date: April 30, 2021

/s/ Deborah I. Ecker